

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.¹
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: PROMESA
: Title III
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: Case No. 17-BK-3283 (LTS)
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: (Jointly Administered)
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**INFORMATIVE MOTION OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS REGARDING MARCH 3-4, 2020 HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all Title III Debtors (the “Committee”)² hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of December 11-12, 2019 Hearing* [Case No. 17-3283, Docket No. 9388] (the “Scheduling Order”) and respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

1. Luc A. Despins and G. Alexander Bongartz of Paul Hastings LLP will appear in person on behalf of the Committee at the Hearing (as defined in the Scheduling Order) in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico, and address, as necessary, the following matters:

- (a) *Amended Report and Recommendation of the Mediation Team* [Case No. 17-3283, Docket No. 10756];
 - (i) *Omnibus Response of Official Committee of Unsecured Creditors to (A) Amended Report and Recommendation of Mediation Team and (B) Joint Motion for an Order (I) Scheduling a Hearing to Consider Adequacy of Information Contained in Disclosure Statement, (II) Establishing Deadline for Filing Spanish Translation of Disclosure Statement, (III) Establishing Deadline for Filing Objections to Disclosure Statement and Replies Thereto, and (IV) Granting Related Relief* [Case No. 17-3283, Docket No. 11482];
- (b) *Joint Motion of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority for An Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Spanish Translation of the Disclosure Statement, (III) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, and (IV) Granting Related Relief* [Case No. 17-3283, Docket No. 10808];

- (i) *Omnibus Reply in Further Support of Motion of Official Committee of Unsecured Creditors for Order, Pursuant to Bankruptcy Code Sections 105(A) and 502 and Bankruptcy Rule 3007, (A) Setting Briefing Schedule and Hearing Date for Omnibus Objection to Claims Filed or Asserted Against Commonwealth by Holders of General Obligation Bonds Asserting Priority Over Other Commonwealth Unsecured Creditors, (B) Approving Form of Notice and (C) Granting Related Relief [Case No. 17-3283, Docket No. 1177];*
- (c) *Motion of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for an Order (A) Establishing Pre-Solicitation Procedures for Certain Holders of Retirement Benefit Claims, (B) Establishing Procedures and Deadlines for Submission of Information Necessary for Solicitation of Acceptance or Rejection of Plan of Adjustment by such Claimants, and (C) Approving Form and Manner of Notice Thereof [Case No. 17-3283, Docket No. 10839, Case No. 17-3566, Docket No. 810];*
- (i) *Limited Response of Official Committee of Unsecured Creditors to Motion of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for an Order (A) Establishing Pre-solicitation Procedures for Certain Holders of Retirement Benefit Claims, (B) Establishing Procedures and Deadlines for Submission of Information Necessary for Solicitation of Acceptance or Rejection of Plan of Adjustment by Such Claimants, and (C) Approving*

Form and Manner of Notice Thereof [Case No. 17-3283, Docket No. 11335, Case No. 17-3566, Docket No. 813];

- (d) *Motion of Official Committee of Unsecured Creditors for Order, Pursuant to Bankruptcy Code Sections 105(a) and 502 and Bankruptcy Rule 3007, to (A) Setting Briefing Schedule and Hearing Date for Omnibus Objection to Claims Filed or Asserted Against Commonwealth by Holders of General Obligation Bonds Asserting Priority Over Other Commonwealth Unsecured Creditors [Docket No. 10638] (B) Approving Form of Notice and (C) Granting Related Relief* [Case No. 17-3283, Docket No. 10754];
- (e) *The Official Committee of Unsecured Creditors' Motion for Intervention Under Bankruptcy Rule 7024 and Relief from Certain Briefing Limitations* [Adv. Case No. 20-003, Docket No. 9; Adv. Case No. 20-004, Docket No. 11; Adv. Case No. 20-005, Docket No. 9; Adv. Case No. 20-007, Docket No. 15];
 - (i) *Reply in Support of Official Committee of Unsecured Creditors' Motion for Intervention Under Bankruptcy Rule 7024 and Relief from Certain Briefing Limitations* [Adv. Proc. No. 20-003, Docket No. 18; Adv. Proc. No. 20-004, Docket No. 20; Adv. Proc. No. 20-005, Docket No. 30; Adv. Proc. No. 20-007, Docket No. 31];
- (f) *Urgent Motion of Assured Guaranty Corp., Assured Guaranty Municipal Corp., Ambac Assurance Corporation, Financial Guaranty Insurance Company, and National Public Finance Guarantee Corporation, as Holders and Insurers of HTA Bonds, to Compel Production of Documents Concerning Preliminary Hearing on Lift-Stay Motion* [Case No. 17-3283, Docket No. 11686];

- (g) *Urgent Motion of Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and Financial Guaranty Insurance Company to Compel Production of Documents Relating to the Preliminary Hearing on the CCDA and PRIFA Lift-Stay Motions* [Case No. 17-3283, Docket No. 11687];
- (h) *Fee Examiner's Report on Uncontested Professional Fee Matters for Consideration in Connection With the March 4, 2020 Omnibus Hearing* [Case No. 17-3283, Docket No. 11785];
- (i) Any objections, responses, statements, joinders, or replies to any of the foregoing pleading; and
- (j) Any statements made by any party in connection with the Title III cases or any adversary proceeding pending therein.

2. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will also be attending, on behalf of the Committee, the Hearing in San Juan, Puerto Rico.

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WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: February 28, 2020

/s/ Luc A. Despins

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/s/ Juan J. Casillas Ayala

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